

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)

v.)

1. CASSANDRA BEATTY)

2. TERRENCE DAVIS)

CRIMINAL NO.

VIOLATIONS:

21 U.S.C. § 963

Conspiracy to Import Cocaine

21 U.S.C. §§ 952(a) & 960(a)

Importation of Cocaine

21 U.S.C. § 853

Forfeiture Allegation

04 CR 10076 RGS

INDICTMENT

COUNT ONE: (21 U.S.C. § 963 - Conspiracy to Import Cocaine)

The Grand Jury charges that:

In or about December 2003, in Boston, in the District of
Massachusetts, in Jamaica, and elsewhere,

1. CASSANDRA BEATTY, and

2. TERRENCE DAVIS

defendants herein, did knowingly and intentionally combine,
conspire, confederate and agree with each other, and with persons
known and unknown to the Grand Jury, to import into the United
States, from a place outside thereof, cocaine, a Schedule II
controlled substance, in violation of Title 21, United States
Code, Sections 952(a) and 96(a).

The Grand Jury further charges that the conspiracy involved
500 grams or more of a mixture or substance containing a
detectable amount of cocaine, in violation of Title 21, United
States Code, Section 841(b)(1)(B)(i).

All in violation of Title 21, United States Code, Section 963.

COUNT TWO: **(21 U.S.C. § 952(a) & 960(a) - Unlawful
Importation of Cocaine)**

The Grand Jury further charges that:

On or about December 2, 2003, in Boston, in the District of
Massachusetts, and elsewhere,

CASSANDRA BEATTY,

defendant herein, did knowingly and intentionally import into the
United States, from a place outside thereof, cocaine, a Schedule
II controlled substance.

All in violation of Title 21, United States Code, Sections
952(a) and 960(a).

**COUNT THREE: (21 U.S.C. §§ 952(a) & 960(a) - Unlawful
Importation of Cocaine)**

The Grand Jury further charges that:

On or about December 2, 2003, in Boston, in the District of
Massachusetts, and elsewhere,

TERRENCE DAVIS,

defendant herein, did knowingly and intentionally import into the
United States, from a place outside thereof, cocaine, a Schedule
II controlled substance.

The Grand Jury further charges that the importation involved
500 grams or more of a mixture or substance containing a
detectable amount of cocaine, in violation of Title 21, United
States Code, Section 841(b)(1)(B)(i).

All in violation of Title 21, United States Code, Sections
952(a) and 960(a).

FORFEITURE ALLEGATION

(21 U.S.C. § 853)

The Grand Jury further charges that:

1. As a result of the narcotics offenses alleged in Counts One, Two, and Three of this Indictment,

CASSANDRA BEATTY and

TERRENCE DAVIS

defendants herein, shall forfeit to the United States any and all property constituting, or derived from, any proceeds the defendants obtained, directly or indirectly, as a result of such offenses; and/or any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violations.

2. If any of the property described in paragraph 1, above, as a result of any act or omission of the defendants --

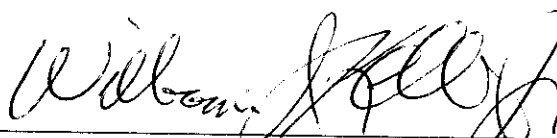
- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

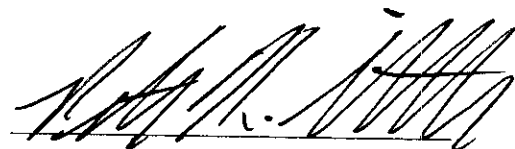
it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any

other property of the defendants up to the value of the property described in paragraphs 1 and 2.

All in violation of Title 18, United States Code, Section 982, and Title 21, United States Code, Section 853.

A TRUE BILL

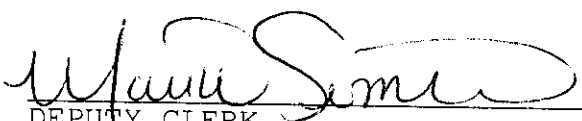

FOREPERSON OF THE GRAND JURY



PETER K. LEVITT
ASSISTANT U.S. ATTORNEY

DISTRICT OF MASSACHUSETTS; ^{March} 18, 2004. ^{1:49}

Returned into the District Court by the Grand Jurors and
filed.


DEPUTY CLERK